



REGION 4

ATLANTA, GA 30303

SENT VIA ELECTRONIC MAIL

Hailey Ramirez
Director of Warehouse
Operations
AI Alabama DC LLC
30800 CR-49
Loxley, Alabama 36551
Hailey.Ramirez@aldi.us

Dear Hailey Ramirez:

Enclosed is a copy of the final Inspection Report (Enclosure A) generated by the Environmental Protection Agency Region 4 Air Enforcement Branch for the December 12, 2024, partial compliance inspection of the AI Alabama DC LLC facility, located at 30800 CR-49 Loxley, Alabama, 36551.

The EPA previously sent a copy of the draft report in an email on February 5, 2025, allowing AI Alabama DC LLC to make any comments regarding the report and to claim any information contained in the report as confidential business information (CBI). In an email dated February 14, 2025, the AI Alabama DC LLC, notified EPA that no information was being claimed CBI.

Should you have any questions regarding the inspection report, please contact me at (404) 562-9198, or by email at warrilow.phyllis@epa.gov.

Sincerely,

**PHYLLIS
WARRILOW**

Phyllis Warrilow, PE
Environmental Engineer
South Air Enforcement Section

Digitally signed by PHYLLIS
WARRILOW
Date: 2025.02.19 13:55:11 -05'00'

Enclosure

ENCLOSURE A
INSPECTION REPORT

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: Al Alabama DC LLC

Location (Address): 30800 CR-49, Loxley, Alabama 36551

Inspection Date: December 12, 2024

Type of Inspection (Full or Partial Compliance Evaluation):

Partial Compliance Evaluation focused on the Clean Air Act (CAA) 112 (r)(1) General Duty Clause requirements of the ammonia refrigeration system.

ICIS-Air Number: 3601756355

EPA Region 4 Investigator(s)/Inspector(s):

1. Phyllis Warrilow, Environmental Engineer

State/Local Investigator(s)/Inspector(s):
none

Person(s) Contacted at Facility (Name and Title):

1. Hailey Ramirez, Director of Warehouse Operations
2. Heidi Streiber, Warehouse Operations Manager
3. Troy Fung, Maintenance Tech
4. Dereck Barnard, Maintenance Tech

Report Prepared by: Phyllis Warrilow

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	NAICS 445110 – Supermarkets and other grocery retailers (except convenience retailers).
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	N/A
3. Air permit issuance date.	N/A
4. Air permit expiration date.	N/A
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	N/A
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	Clean Air Act § 112(r)(1)
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Ammonia refrigeration system
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	N/A

B. Process Description

Al Alabama DC LLC (Facility) is located at 30800 CR-49, Loxley, Alabama 36551, Loxley, Alabama is classified under NAICS Code 445110 – Supermarkets and other grocery retailers (except

convenience retailers). The Al Alabama DC LLC facility was commissioned in 2022 and has been in operation since that time. It is located on a 150 acre site and supports stores in the south east United States. The facility includes cold and ambient storage with a total of 564,000 square feet of operations comprised of 250,000 square feet of refrigerated/freezer space and the balance used as dry storage warehouse and regional office space. The facility operates 361 days per year, with 7-day work weeks and 2 shifts plus maintenance per day. The facility employs approximately 160 persons.

The facility uses an ammonia refrigeration system to cool inventory and product. The facility had 7,005 lbs of ammonia on site at the time of the inspection per invoices.

III. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	The EPA Region 4 (R4) inspector arrived at the Facility on December 12, 2024, at approximately 9:05 AM Central Time
2. Credentials presented to facility personnel (include name and title).	Y	The EPA Inspector presented credentials to: Hailey Ramirez, Director of Warehouse Operations Heidi Streiber, Warehouse Operations Manager Troy Fung, Maintenance Tech Dereck Barnard, Maintenance Tech

Activity	Yes No NA	Comments
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	The opening conference began at 9:27 AM Central Time during which the purpose and objectives of the inspection were explained. The opening conference was led by EPA inspector Phyllis Warrilow as well as members of Aldi Inc., Loxley Division management. The inspector explained that they were conducting a Clean Air Act inspection specifically focused on the General Duty Clause requirements of the ammonia refrigerant system.

Activity	Yes No NA	Comments
4. Discussed safety issues.	Y	The inspector discussed Facility-specific safety and emergency procedures. Ear plugs, safety glasses, coats, gloves, shoe, and hair coverings were provided as needed.
5. Discussed which records to be reviewed.	Y	The EPA inspector requested to review the following records: - Piping and instrumentation diagrams for the ammonia refrigeration system - Hazard assessment for the ammonia refrigeration system - Standard operating procedures relating to the ammonia refrigeration system - Documentation of the preventive maintenance/mechanical integrity program for the ammonia refrigeration system - Records of the most recent calibration or testing of any ammonia sensors/alarms - Pressure Relief Valve recertifications - Facility's emergency response plan or emergency action plan - Documentation of the total amount of ammonia in the refrigeration system
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	
7. Discussed facility policy regarding photographs or video (if applicable).	N/A	

Activity	Yes No NA	Comments
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	
9. Discussed CBI.	Y	EPA inspectors indicated that any documents claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.

Activity	Yes No NA	Comments
Records Reviewed at the Facility 10. The types of records reviewed, and the time period reviewed.	Y	EPA inspectors requested the following records during the inspection: - Documentation of the total amount of ammonia in the refrigeration system. -Piping and instrumentation diagrams for the ammonia refrigeration system. -Process Hazard Analysis. -Documentation of the preventive maintenance/mechanical integrity program for the ammonia refrigeration system. -Standard operating procedures relating to the ammonia refrigeration system -Confirmation of the most recent calibration or testing of any ammonia sensors/alarms, - Records of Pressure Relief Valve recertifications. (Required every 5 years), -Facility's emergency response plan or emergency action plan. Records of the Process Hazard Analysis for the ammonia refrigeration system were not presented to EPA at the time of the inspection.

Activity	Yes No NA	Comments
Facility Walk-Through Observations		
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	The facility has four compressors. Compressors 1,3,4 and 5 were operating at time of the inspection. Compressors 2 and 3 are swing compressors. At approximately 10:37 AM on Dec 12, 2024: Compressor Number 1 was observed to be operating at a discharge pressure of 150 PSIG and a suction pressure of 3 PSIG. Compressor Number 3 was observed to be operating at a discharge pressure of 150 PSIG and a suction pressure of 3 PSIG. Compressor Number 4 was observed to be operating at a discharge pressure of 150 PSIG and a suction pressure of 19 PSIG.

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. 13. Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
14. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
15. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	As part of the walk through at approximately 10:30 am on Dec 12, 2024, the EPA inspector observed ammonia detectors in the machine room and throughout the facility. The facility operates 12 ammonia detectors. The last calibration of the ammonia sensors occurred August 21, 2024. The pressure safety relief valves in the machine room were current and will expire in August 2027, they were installed in August of 2022 when the facility was commissioned.

Activity	Yes No NA	Comments
17. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
18. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	
19. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
20. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N/A	

Activity	Yes No NA	Comments
21. Were any visible emissions observed? (if yes, identify the location and equipment).	N/A	
22. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N/A	
23. Was the cause of the visible emissions investigated and the information documented?	N/A	
24. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N/A	
25. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
26. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N/A	

Activity	Yes No NA	Comments
27. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	
28. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N/A	
Closing Meeting		
29. Conducted a closing meeting.	Y	The closing meeting was conducted starting at 11:30 AM on December 12, 2024. Attendees were the EPA inspector and Hailey Ramirez, Director of Warehouse Operations

Activity	Yes No NA	Comments
30. Summarize any additional information needed, if applicable?	Y	Facility had all requested documents except for the Process Hazard Analysis.
31. Accept a declaration of CBI, if applicable?	N/A	

Activity	Yes No NA	Comments
32. Discussed observations.	Y	The facility's mechanical equipment and mechanical integrity program was implemented by maintenance personnel. Some records were computerized and easily retrievable. The Facility was able to verify the following records for the ammonia refrigerant system: - Documentation of the total amount of ammonia in the refrigeration system - Pressure safety valve certifications. - Dates of the most recent calibration or testing of any ammonia sensors/alarms. - Process & Instrumentation Diagram - Standard Operating Procedures - Preventative Maintenance records - Facility Emergency Response Plan Mechanical Integrity and Preventative maintenance were kept on schedule by maintenance personnel and ammonia refrigeration contractors. Process Hazard Analysis not given at time of inspection.

Activity	Yes No NA	Comments
33. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 70-day timeframe. Document requests were discussed.
34. Date and time inspection concluded.		On December 12, 2024, at approximately 11:50 AM the Region 4 inspector left the Facility and concluded the inspection.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	Process Hazard Analysis for the ammonia refrigeration system was not presented at the time of the inspection.

EPA Investigator/Inspector Signature: PHYLLIS WARRILOW Digitally signed by PHYLLIS WARRILOW
Date: 2025.02.19 13:56:18 -05'00'

EPA Supervisor Signature & Title TODD GROENDYKE Digitally signed by TODD
GROENDYKE
Date: 2025.02.19 14:19:38 -05'00'

Date Report Finalized: 2/19/2025

APPENDICES AND ATTACHMENTS

Appendix A: Document Receipt Log

No documents were obtained from Facility representatives during the on-site inspection.

